Cao Wei et al, "Multi-Conductor Transmission Lines in Multi-Layered Dielectric Media," IEEE Transactions on Microwave Theory and Techniques, vol 32, No. 4, pp 439-450, April, 1984

Matton Kamon et al, "FASTHENRY: A Multipole-Accelerated 3-D Inductance Extraction Program," IEEE Transactions on Microwave Theory and Techniques, vol 42, No. 9, pp 1750-1758, September 1994

The 112 rejection is therefore improper and should be withdrawn.

The rejection of all claims as unpatentable over Huber et al in view of Righi et al is respectfully traversed, since the references fail to disclose or suggest the subject matter of applicant's invention, as defined by the claims. Note first that the Huber discloses a computer **design** system, not a computer **modeling** system. Note further that the "partition group assertions" of Huber represent **different packages**, not **segments of a single package**, as in applicant's invention. These are basic differences, which clearly disqualify Huber et al with respect to any alleged relevance to applicant's invention.

In any event, Huber is cited merely to show the combination of 1) an input system, 2) an analysis program, 3) a partitioning program and 4) an output system. Viewed on such simple terms, it could be a hand-held calculator. But the Huber system is not that simple, and is not applicable to modeling a single package or a single circuit. It is not relevant.

Righi et al is cited to show that segmentation has been "proposed" in a system for the analysis of packaged circuits, wherein each segment consists of a circuit segment and a package segment. This is a concept only, and not a specific system for modeling. There is no logical basis for the Examiner's contention that Huber et al could readily be modified to implement the Righi concept.

A rocket to the moon was proposed by Buck Rogers. But that proposal did not stand up as a valid reference against NASA patents which "merely implemented the Rogers concept" using known rocket science and technology.
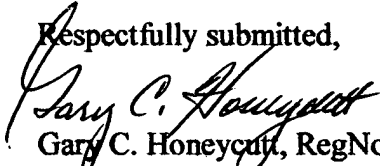
Moreover, applicant's claim 1, for example, is not directed broadly to the general combination of an input, a segment generator, an analysis generator, an integrator, and an output. Instead it is directed to a combination that includes specific details within each of said subsystems. And the subsystems are inter-related in a specific manner, none of which is suggested in the references. New features added to claim 1 include means for selecting the most effective segments, and means for quantifying alternative model choices. In claim 2, for example, the segment selector is further limited and organized in a manner not suggested in the cited art.

Still further, the Examiner has repeatedly asserted his personal opinion that the invention is "obvious," without citing any reference to support his opinion. Such an approach to examination has been discredited many decades ago. If the Examiner wishes to cite his own expertise, he should submit an affidavit showing that he is a qualified expert in package modeling.

Note that new claims 32 and 33 include additional inventive features.

For all the above reasons, applicant now believes the application is in condition for allowance. Notice to that effect is respectfully requested.

Respectfully submitted,

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